


Application **GRANTED**. The referenced letter may be filed with the proposed redactions. The unredacted version of the letter has been filed at Dkt. 45.

**Via ECF**

Honorable Lorna G. Schofield  
United States District Court  
for the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

Dated: February 12, 2025  
New York, New York



**LORNA G. SCHOFIELD**  
**UNITED STATES DISTRICT JUDGE**

Re: Vargas v. Barclays Bank Delaware  
Case No. 24-cv-06549-LGS (S.D.N.Y.)

Dear Judge Schofield:

My firm, along with our co-counsel, Laukaitis Law LLC, represent the plaintiff and the proposed class in the above-referenced action.

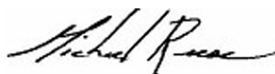
In response to the Court's Orders of January 27, 2025 (ECF No. 50) and February 11, 2025 (ECF No. 59), we submit this letter to re-new our motion to file under seal (ECF No. 44) the letter previously filed on January 25, 2025 (ECF No. 45).

A partially redacted version of ECF No. 45 is being filed simultaneously as an exhibit to this letter motion. We request the unredacted parts of ECF No. 45 remain under seal because they provide sensitive, confidential information that could be harmful to the plaintiff if made public. see ECF No. 37.

We note that this Court has already ruled that the "Application [is] GRANTED in part as to Plaintiff's identity information and otherwise DENIED without prejudice to renew." See ECF No. 50. Accordingly, pursuant to the Court's prior ruling, the Plaintiff's identity information is redacted.

The additional section redacted provides the reason that the identity information is redacted. This explanatory section should also be redacted as it explains the reasons why the plaintiff is particularly vulnerable regarding disclosure of his identity. Indeed, in litigation alleging data-breach or other misappropriation of personally identifiable information ("PII"), as is the case here against Defendant Barclays, it is common for plaintiffs to proceed under a pseudonym to protect them from further harm due to the misappropriation of their PII.

Respectfully submitted,



Michael R. Reese

**Appendix Pursuant to Individual Civil Rule I.D.3**

Defendant and all counsel representing Defendant in this matter who are subject to the Confidentiality Order (ECF No. 37) should have access to the letter filed under seal.